

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

**DECLARATION OF MICHAEL D. BLATCHLEY IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL DISCOVERY**

I, Michael D. Blatchley, declare:

1. I am a partner at the law firm of Bernstein Litowitz Berger & Grossmann LLP ("Bernstein Litowitz"), and together with Stoll Stoll Berne Lokting & Shlachter P.C. ("Stoll Berne"), serve as Lead Counsel for the proposed Class in this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto. I submit this declaration in support of Plaintiffs' Motion to Compel Discovery.

2. Attached as Exhibits A through CC are true and correct copies of the following documents:

EXHIBIT A: Press release from the Colorado Attorney General titled, "Attorney General Phil Weiser announces CenturyLink will pay \$8,476,000 for charging hidden fees, overbilling Colorado," dated December 19, 2019.

EXHIBIT B: Press release from the Minnesota Attorney General titled, "Attorney General Ellison obtains nearly \$9 million settlement with CenturyLink for overcharging Minnesota customers," dated January 8, 2020.

- EXHIBIT C:** Press release from the Washington Attorney General titled, “AG Ferguson: CenturyLink will Pay \$6.1 million over Hidden Fees Affecting 650,000 Washingtonians,” dated December 10, 2019.
- EXHIBIT D:** May 6, 2015 Email from Jennifer M. Martin to Lorna Christian, Bates-stamped CTLMNSEC00015392-15396.
- EXHIBIT E:** Email from Patrick Gibbs to Michael D. Blatchley dated August 19, 2019.
- EXHIBIT F:** Plaintiffs’ First Request for Production of Documents to Defendant CenturyLink, Inc. dated September 4, 2019.
- EXHIBIT G:** Plaintiffs’ First Interrogatories to Defendant CenturyLink, Inc. dated September 4, 2019.
- EXHIBIT H:** Plaintiffs’ Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) dated September 17, 2019.
- EXHIBIT I:** Defendants’ Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) dated September 17, 2019.
- EXHIBIT J:** Defendants’ Supplemental Rule 26.01(a) Initial Disclosures dated August 14, 2019, *State of Minnesota v. CenturyTel*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.), Bates-stamped CTLMNSEC00015417-15424.
- EXHIBIT K:** Press Release from CenturyLink titled, “CenturyLink announces conclusion of Special Committee investigation,” dated December 7, 2017.
- EXHIBIT L:** Order Enforcing Prior Discovery Order & Granting Sanctions dated June 25, 2019, *State of Minnesota v. CenturyTel*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.), Bates-stamped CTLMNSEC00020867-20869.
- EXHIBIT M:** Order on State’s Motion for Sanctions dated October 15, 2019, *State of Minnesota v. CenturyTel*, No. 02-CV-17-

3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.), Bates-stamped CTLMNSEC00132140-132141.

- EXHIBIT N:** Transcript of Pretrial Conference before Judge Menendez dated October 1, 2019, *In re CenturyLink Sales Practices and Sec. Litig.*, MDL No. 17-2795 (D. Minn.).
- EXHIBIT O:** Email from Michael D. Blatchley to Ryan Blair dated February 25, 2020.
- EXHIBIT P:** The State's Memorandum of Law in Support of its Third Motion to Compel Discovery, *State of Minnesota v. CenturyTel*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.), Bates-stamped CTLMNSEC00021957-21968.
- EXHIBIT Q:** Letter from Michael D. Blatchley to Patrick Gibbs dated October 15, 2019.
- EXHIBIT R:** Letter from Patrick Gibbs to Michael D. Blatchley dated October 21, 2019.
- EXHIBIT S:** Defendants' Memorandum in Opposition to the State's Third Motion to Compel Discovery, *State of Minnesota v. CenturyTel*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.), Bates-stamped CTLMNSEC00022505-22514.
- EXHIBIT T:** Letter from Michael D. Blatchley to Sarah Lightdale dated November 7, 2019
- EXHIBIT U:** Affidavit of Dana Moss in Opposition to the State's Third Motion to Compel, *State of Minnesota v. CenturyTel*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.), Bates-stamped CTLMNSEC00022439-22442.
- EXHIBIT V:** Letter from Sarah Lightdale to Michael D. Blatchley dated November 19, 2019.
- EXHIBIT W:** Letter from Michael D. Blatchley to Bryan Koch dated February 3, 2020.

- EXHIBIT X:** Letter from Bryan Koch to Michael D. Blatchley dated February 14, 2020.
- EXHIBIT Y:** Email from Bryan Koch to Julia Tebor dated January 27, 2020.
- EXHIBIT Z:** Letter from Patrick Gibbs to Michael D. Blatchley dated November 4, 2019.
- EXHIBIT AA:** CenturyLink's Form 8-K filed with the United States Securities Exchange Commission on January 16, 2020.
- EXHIBIT BB:** Press release from the Oregon Attorney General titled, "AG Rosenblum Announces \$4 Million Settlement with CenturyLink," dated December 31, 2019.
- EXHIBIT CC:** Email from Julia Tebor to CenturyLink's counsel dated January 10, 2020.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 25th day of February, 2020.

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

By: /s/ Michael D. Blatchley

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